

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

APR 12 2017 *EV*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Quinn Rickert

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

Ofc. Williams

1:17-cv-02792
Judge Marvin E. Aspen
Magistrate Judge Sidney I. Schenkier
PC8

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

- ☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)
- ☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)
- ☐ OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: Quinn Rickert
- B. List all aliases: _____
- C. Prisoner identification number: M38296
- D. Place of present confinement: Pontiac C.C.
- E. Address: P.O. Box 99, Pontiac, IL 61764-0099

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Mr. Williams
- Title: Correctional Officer
- Place of Employment: Pontiac Correctional Center
- B. Defendant: _____
- Title: _____
- Place of Employment: _____
- C. Defendant: _____
- Title: _____
- Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

At 1:40 PM March 8th 2017, I was escorted from My cell to the visiting room at the Pontiac Correctional Center, For a visit from My Dad. When Me and My escorting officer arrived inside the visiting center, the escorting officer handed Me over to Officer Williams. Officer Williams walked Me inside the inmate shakedown room, He directed Me to step inside the Shakedown cage, so that he could remove My handcuffs. After He removed My handcuffs, he told Me to strip down. While I was removing My clothes, I glanced over at the desk to see if there was any inmate mail on it, I said "No mail today" Officer Williams replied "Nope". After Officer Williams searched Me and My clothes, He told Me to "get dressed". As I was getting dressed I asked Officer Williams "Don't You think that it is weird that they have You looking over and sorting inmate mail here in the visiting room", He replied "Nope that's just how we do it in Pontiac". After I got dressed, Officer Williams proceeded to put handcuffs on Me, He then said "Kneel on the chair". While I kneeled on the chair Officer Williams proceeded to put leg shackles on Me. While He was doing that I said "My mail has been so slow ever since I first arrived here, I think it's because You guys take the mail everywhere to sort it, I would like to write a grievance to fix this, because I don't think that You are supposed to be taking the mail outside the mailroom like that to sort and check it". After he finished putting leg shackles on Me, He told Me to "step down". As I stepped down Officer Williams Kicked Me

On the calf section of My right leg, I replied "what the fuck" Officer Williams stepped outside the cage and stated "Don't worry about what I do with the mail, worry about Your fuckin self". I walked out of the cage with the pain throbbing in My leg, Officer Williams followed behind Me as we proceeded to My visit. After the visit with My Dad, Officer Williams escorted Me back to the cage and unshackled my legs, He then escorted Me to the inmate waiting area. In the inmate waiting area Officer Williams handcuffed me to the seat. About ten minutes later another officer arrived and He escorted Me to My cell. When I arrived in My cell, I lifted up My pant leg and observed a red welt on My lower calf on My right leg where Officer Williams Kicked Me. My roommate Daniel Kellogg also observed the welt from officer Williams Kicking Me, His Declaration is made in exhibit B. On March 11th I had a large bruise and lump on My lower calf on My right leg where Officer Williams Kicked Me. On March 12th 2017 I sent a grievance to the Pontiac Grievance Officer exhibit A regarding Officer Williams Kicking Me, I also sent a letter regarding the situation to the Chicago F.B.I exhibit C, ~~and I also sent a letter to the Chicago F.B.I regarding the situation~~
~~regarding the situation~~

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

That this court find in Favor of Plaintiff for compensatory and punitive damages for the violation of My Constitutional Rights. And all other awards this court finds just and appropriate.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 9th day of April, 2017

Quinn D. Rickert

(Signature of plaintiff or plaintiffs)

Quinn Rickert

(Print name)

M38296

(I.D. Number)

P.O. Box 99

Pontiac, IL 61764-0099

(Address)

ILLINOIS DEPARTMENT OF CORRECTIONS
OFFENDER'S GRIEVANCE

Date: <u>March 12, 2017</u>	Offender: <u>Quinn Rickert</u> (Please Print)	ID#: <u>M38296</u>
Present Facility: <u>Pontiac C.C.</u>	Facility where grievance issue occurred: <u>Pontiac C.C.</u>	
NATURE OF GRIEVANCE:		
<input type="checkbox"/> Personal Property	<input type="checkbox"/> Mail Handling	<input type="checkbox"/> Restoration of Good Time
<input checked="" type="checkbox"/> Staff Conduct	<input type="checkbox"/> Dietary	<input type="checkbox"/> Medical Treatment
<input type="checkbox"/> Transfer Denial by Facility	<input type="checkbox"/> Transfer Denial by Transfer Coordinator	<input type="checkbox"/> ADA Disability Accommodation
		<input type="checkbox"/> HIPAA
		<input type="checkbox"/> Other (specify): _____
<input type="checkbox"/> Disciplinary Report: _____ Date of Report Facility where issued		
Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.		
Complete: Attach a copy of any pertinent document (such as a Disciplinary Report, Shakedown Record, etc.) and send to: Counselor, unless the issue involves discipline, is deemed an emergency, or is subject to direct review by the Administrative Review Board. Grievance Officer, only if the issue involves discipline at the present facility or issue not resolved by Counselor. Chief Administrative Officer, only if EMERGENCY grievance. Administrative Review Board, only if the issue involves transfer denial by the Transfer Coordinator, protective custody, involuntary administration of psychotropic drugs, issues from another facility except personal property issues, or issues not resolved by the Chief Administrative Officer.		
Summary of Grievance (Provide information including a description of what happened, when and where it happened, and the name or identifying information for each person involved):		
<u>• At 1:40 PM March 8, 2017 I went to a visit and officer Williams was the shakedown Officer there.</u>		
<u>• I witnessed officer Williams sorting mail in the shakedown room, multiple times before this occasion.</u>		
<u>• I told Officer Williams that I was going to write a grievance about the current mail sorting procedures.</u>		
<u>• After Officer Williams put leg shackles on Me He Kicked Me on the lower calf section of My right leg.</u>		
<u>• He told Me after he kicked Me "Don't worry about what I do with the mail, worry about Your fuckin self".</u>		
<u>• When I returned back from My visit to My cell I observed a large red welt on My Lower right calf.</u>		
<u>• My roommate Daniel Kellogg K72153 also observed the bruise on My leg.</u>		
<u>• On March 11th 2017 I had a large bruise and lump on My Lower right calf and it was painful.</u>		
<u>• The cameras in the visiting room and shakedown room are in witness to officer Williams doing this.</u>		
Relief Requested: <u>1. Officer Williams to be reprimanded and charged.</u>		
<u>2. Officer Williams to monetarily compensate Me for the damages he caused to Me.</u>		
<input type="checkbox"/> Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.		
<u>Quinn D. Rickert</u> Offender's Signature		<u>M38296</u> ID#
		<u>03 / 12 / 2017</u> Date
(Continue on reverse side if necessary)		

Counselor's Response (if applicable)	
Date Received: _____	<input type="checkbox"/> Send directly to Grievance Officer
<input type="checkbox"/> Outside jurisdiction of this facility. Send to Administrative Review Board, P.O. Box 19277, Springfield, IL 62794-9277	
Response: _____	

Quinn Rickert,
Plaintiff,

V.

Ofc. Williams,
Defendant

DECLARATION
OF DANIEL KELLOGG

Civil Action
No.

Daniel Kellogg hereby declares:

I have been incarcerated at Pontiac Correctional Center since October 2016. Since January of 2016 I have been housed in West House 3rd gallery. I am currently in cell 302, which is the same cell as Quinn Rickert. And we have been in the same cell together for several months.

On March 8, 2017, I saw Quinn Rickert return from his visit. He put his right leg up on the bunk bed, as he rolled up his right pant leg he explained that Officer Williams Kicked him before his visit, I observed a large red welt on the lower calf region of his right leg.

On March 11, 2017, I observed a large bruise on the lower calf portion of Quinn Rickert's leg. He was also experiencing some pain.

In the past during My time in The Pontiac Correctional Center, I have observed Officer Williams processing inmate mail in the visiting room.

I declare under penalty of perjury that the foregoing is true and correct.
Executed at Pontiac, IL on April 9, 2017

Daniel Kellogg

Dr. Daniel Kellogg

Registration No. K72153
P.O. Box 99
Pontiac, IL 61764-0099

March 12, 2017

Handwritten copy of letter sent to F.B.I
Case: 1:17-cv-02792 Document # 1 Filed: 04/12/17 Page 8 of 8 PageID #: 8
FBI Chicago Division
2111 W Roosevelt Road
Chicago, IL 60608

EXHIBIT C

Dear, F.B.I Chicago Office

I am writing You today concerning an incident that occurred at Pontiac C.C. My current prison. The incident was an Officer last name Williams assaulting Me during a routine shakedown procedure before entering the visiting room. I have attached a handwritten copy of a grievance that I filed with The Grievance Officer of Pontiac C.C. briefly describing the incident that occurred March 8th 2017. I am asking for Your Agency to conduct a full investigation into the incident. I am open to making a full Statement to Your Agency if You desire to come interview Me.

Sincerely,

Quinn D. Rickert

Quinn Rickert

M38296

Pontiac Correctional Center

P.O. Box 99

Pontiac, IL 61764-0099